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PARALEGAL
Maria Nunez, B.S.

October 8, 2024

Via ECF

Honorable Paul G. Gardephe
United States District Court Judge
United States District Court
Southern District of New York
40 Foley Square
New York, NY 10007

Re: *USA v. Gabriel Valdez*
Case No.: 23-CR-204(PG)

Your Honor:

This office represents Gabriel Valdez, a defendant in the above referenced matter, which is scheduled for sentencing October 16, 2024 at 3 p.m. **We write to request an adjournment of sentencing for a period of 14 days (until October 30th after 1 p.m., or October 31st after 2 p.m.)** so that the final PSR, which was received by this office on September 5th, can be reviewed by the Defendant and counsel; and a sentencing memorandum can be filed within the time set forth by the Court's Rules.

Although the PSR was sent into the MDC on September 12th, the MDC has failed to deliver to provide same to our client. We are having another copy of the PSR hand delivered to the MDC TODAY in the hope that they will provided same to our client in advance of a scheduled counsel visit on Friday. I am available on October 30th after 1 p.m., or October 31st after 2 p.m , if the Court can accommodate us.

I have advised AUSA's Fiddelman and AUSA Herman and they consent to this request. The Court's consideration of this request is respectfully appreciated. Thank you.

Yours truly,

John Russo

John L. Russo (JR6200)

Cc: AUSA Jacob Fiddelman
AUSA Michael Herman

MEMO ENDORSED

The Application is granted.

SO ORDERED:

Paul G. Gardephe
Paul G. Gardephe, U.S.D.J.

Dated: *Oct 8, 2024*

*Sentencing is
adjourned to October 30,
2024 at 3:00 p.m.*